

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Southern District of New York
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MEMORANDUM ENDORSED

August 20, 2024

Via ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/20/2024

**Re. United States v. Damel Thomas
24 Cr. 20 (GHW)**

Dear Judge Woods,

I write with the consent of the Government to respectfully request a modification of the schedule for filing sentencing submissions in the above-captioned matter. Sentencing in this matter is scheduled for September 5, 2024, and the parties wish to maintain this date. Under the Court's Individual Rules of Practice, the defense's sentencing submission is due August 22, 2024, two weeks before the sentencing hearing, and the Government's submission is due August 29, 2024, one week before the sentencing hearing. The final Presentence Investigation Report (PSR) is not due to be released to the parties until August 28, 2024, however.

So that the parties can review, incorporate, and respond to the final PSR in their submissions and avoid the need for supplemental filings, we respectfully request that the Court permit the parties' sentencing submissions to be filed by the following dates:

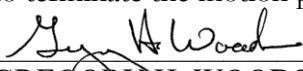
- Defense submission due August 29, 2024
- Government submission due September 3, 2024

Application granted in part and denied in part. The parties' proposal does not provide sufficient time for the Court to review their sentencing submissions and to prepare for the sentencing hearing. The sentencing hearing scheduled for September 5, 2024 is adjourned to September 12, 2024 at 12:00 p.m. The deadline for the defendant's sentencing submissions is extended to August 29, 2024. The deadline for the Government's sentencing submissions is extended to September 5, 2024.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 22.

SO ORDERED.

Dated: August 20, 2024
New York, NY


GREGORY H. WOODS
United States District Judge

Respectfully submitted,

/s/

Neil P. Kelly
Assistant Federal Defender
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